

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

CHARLES H. TIGNER, IV,

Plaintiff,

v.

CASE NO.: 2:21-CV-02475-MSN-tmp

**MEMPHIS POLICE DEPARTMENT
OF THE CITY, ET AL.,**

Defendants.

CITY OF MEMPHIS' MOTION TO DISMISS

Defendant, City of Memphis, Tennessee ("City"), states that the Second Amended Complaint fails to state a claim upon which relief can be granted against it and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure the City hereby moves this court for an order dismissing the City as a party from this case.

Respectfully submitted,

GLANKLER BROWN, PLLC

By: /s/Robert D. Meyers
Robert D. Meyers (TN # 12187)
6000 Poplar Avenue, Suite 400
Memphis, Tennessee 38119
Telephone: (901) 576-1731
Facsimile: (901) 525-2389
rmeyers@glankler.com
Attorney for City of Memphis

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of January 2025, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

Howard Manis
The Cochran Firm
40 South Main St., Suite 1700
Memphis, TN 38103
(901) 843-3476
hmanis@901thefirm.com

Deborah E. Godwin
Mary Elizabeth McKinney
Godwin, Morris, Laurenzi & Bloomfield, P.C.
50 North Front Street, Suite 800
Memphis, TN 38103
(901) 528-1702
dgodwin@gmlblaw.com
bmckinney@gmlblaw.com

Dennis P. Hawkins
City of Memphis
125 North Main Street, Room 336
Memphis, TN 38103
(901) 636-6614
dennis.hawkins@memphistn.gov

Joseph M. Fletcher
Fletcher Law Firm
2400 Poplar Ave., Suite 418
Memphis, TN 38112
(901) 452-3482
JosephM.Fletcher@memphistn.gov

/s/Robert D. Meyers
Robert D. Meyers